

RE: Deposition Availability

Shaffer, J. Kevin (Law)

Sent: Friday, June 18, 2021 12:25 PM

To: Al So [alice.sosa501@gmail.com]



Hi Ms. Sosa,

Before we agree to produce either Renee Virgil or Ketler Louissant, Defendants cannot see the relevance of either individual's testimony to your remaining retaliation claim predicated upon your January 2017 CCHR complaint.

I'm aware, by virtue of you showing Ms. Berger an exhibit during her deposition, that Ms. Virgil filed an OEO complaint against Ms. Berger in March 2018. However, Defendants fail to see how the mere fact that Ms. Virgil filed a complaint against Ms. Berger over 15 months after your alleged protected activity makes her a relevant fact witness with regard to your allegations of retaliation. Defendants do not see why the District 75 Superintendent, Ketler Louissant, is a relevant witness to your allegations of retaliation. Neither party has exchanged any records demonstrating that Superintendent Louissant was involved in any of your alleged adverse retaliatory acts.

Your prior email dated June 6, 2021, requesting to depose these witnesses stated only that the reason for their depositions was "[r]elevant and material facts about retaliation against me in the workplace." Before Defendants agree to produce either Ms. Virgil or Mr. Louissant, could you please provide a more detailed explanation as to why either of these witnesses is relevant to your remaining retaliation claim?

Thanks,
Kevin

J. Kevin Shaffer

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From: Al So [alice.sosa501@gmail.com]
Sent: Wednesday, June 16, 2021 7:08 PM
To: Shaffer, J. Kevin (Law); Marc Russo
Subject: Deposition Availability

Hi Kevin,

Do you have any updates on availability?

I need to know if we will be scheduling any depositions next week by this Friday, June 18th, 2021.

Respectfully,
Alice Sosa